

Supplier Code of Conduct

Responsible Sourcing & Conflict Minerals

1. Purpose

The Avaluxe International GmbH commits to responsible procurement of minerals and metals along its global supply chains. This policy aims to implement the requirements of: EU Regulation 2017/821, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, existing customer requirements, applicable national regulations, as well as internal compliance and sustainability standards. The goal is to ensure that our business activities do not directly or indirectly contribute to armed conflicts, human rights violations, corruption, money laundering, terrorism financing, child labor, forced labor, or other serious risks.

2. Scope

This policy applies to all employees, suppliers, sub-suppliers, intermediaries, and business partners involved in the procurement, trade, or processing of relevant metals and minerals. It particularly covers the trade of tin, tantalum, tungsten, gold (3TG), and other metal and raw material products that pose supply chain risks.

3. Principles of Responsible Procurement

The Avaluxe International GmbH commits to: a risk-based due diligence approach, complete and traceable supply chain documentation, transparent communication with suppliers, continuous supply chain improvement, collaboration with recognized industry initiatives, and adherence to human rights obligations.

4. Management System

4.1. Responsibilities

- Executive Management: Overall responsibility for policy implementation.
- Purchasing Department: Supplier communication and data collection.
- Compliance/Quality Management: Conduct due diligence, risk assessment, and audits.
- Suppliers: Provide accurate origin, process, and compliance information.

4.2. Internal Processes

The Avaluxe International GmbH maintains documented processes for: supplier evaluation, material classification, data collection, risk assessment, escalation measures, documentation management, and archiving.

4.3. Traceability

To the extent economically and technically feasible, the Avaluxe International GmbH requests information regarding: origin countries, smelters/metals refiners, minerals used, supply chain structure.

4.4. Documentation

All relevant evidence is retained for a minimum of five years, including: CMRT-/EMRT declarations, RMAP compliance, supplier statements, risk analyses, audit documents, action plans, and management decisions.

5. Risk Identification and Assessment (OECD Step 2 / Art. 5 EU-VO 2017/821)

The Avaluxe International GmbH identifies and evaluates risks along the supply chain based on geographic, supplier, smelter/refiner risks, sanctions lists, plausibility checks, completeness, and quality of supplier data. Special attention is paid to: Conflict-Affected and High-Risk Areas (CAHRA), unverified smelters, incomplete or conflicting information, and indications of human rights violations. The risk assessment is conducted regularly and as needed.

6. Management Measures (OECD Step 3 / Art. 5 EU-VO 2017/821)

Additional information requests, supplier development measures, Corrective Action Plans (CAP), deadlines, escalations to management, suspension of new orders, and termination of business relationships are documented and tracked. Risk assessment categories: Low, Medium, High. Current risk status is low; RMAP compliance from suppliers is high.

7. Un-independent Inspections/Audits (OECD Step 4 / Art. 6 EU-VO 2017/821)

The Avaluxe International GmbH supports the use of independent and recognized audit programs, such as the Responsible Minerals Assurance Process (RMAP), KIWA, and comparable OECD-compliant programs. Internal and external audits are conducted or commissioned as needed. Audit findings are documented, evaluated, and tracked. Reports include details on safety measures, supply chain traceability, and risk assessment.

8. Reporting and Disclosure (OECD Step 5 / Art. 7 EU-VO 2017/821)

The Avaluxe International GmbH reports appropriately on its due diligence activities and makes relevant information available to the competent authorities and customers upon request. Annual reporting includes: summary of measures to implement compliance obligations, a comprehensive audit report, and references to supplier RMAP compliance.

9. Whistleblower System

Employees, suppliers, and third parties can report violations of this policy through the Avaluxe Compliance Channel. Reports are treated confidentially and investigated in accordance with applicable legal provisions. Email: compliance@avaluxe.de

10. Training and Awareness

Affected employees receive regular training on conflict minerals compliance, supply chain obligations, risk indicators, and documentation requirements.

11. Effective Date

This policy has been in effect since May 8, 2026, and will be reviewed regularly.

Version	Datum	Freigabe
1.0	[08.05.2026]	C. Pernagidis, CEO
1.1	[11.08.2026]	C. Pernagidis, CEO